

District Judge James L. Robart  
Magistrate Judge David W. Christel

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHARLES J. VERKIST and LORI J.  
VERKIST, individually and the marital  
community composed thereof,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:21-cv-00721- JLR-DWC

RENEWED STIPULATED MOTION AND  
~~[PROPOSED]~~ ORDER FOR EXTENSION  
OF DEADLINES

Noted for Consideration:  
March 13, 2023

**JOINT STIPULATION**

The parties hereby jointly STIPULATE AND AGREE to extend the remaining pretrial deadlines and trial date, which were originally forth in the Court's November 1, 2021, Minute Order Setting Trial Date and Related Dates (Dkt. 29), as set forth below.

<b><u>Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Disclosure of expert testimony under FRCP 26(a)(2)	March 27, 2023	September 27, 2023
All motions related to discovery must be filed by ( <i>see</i> LCR 7(d))	April 26, 2023	October 26, 2023
Discovery completed by	May 26, 2023	November 24, 2023

RENEWED STIPULATED MOTION AND ~~[PROPOSED]~~ ORDER  
FOR EXTENSION OF DEADLINES  
[2:21-cv-00721-JLR-DWC] - 1

**UNITED STATES ATTORNEY**  
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Seattle, Washington 98101-1271  
206-553-7970

All dispositive motions and motions challenging expert witness testimony must be filed by ( <i>see</i> LCR 7(d))	June 27, 2023	December 22, 2023
Bench Trial Date	November 6, 2023	Summer 2024

Good cause exists for extending these specific deadlines. The parties moved for an extension of pretrial deadlines on February 21, 2023, on the basis that one of the Plaintiffs recently experienced an unanticipated medical complication that has interfered with the Plaintiffs' ability to participate in the discovery process for a significant period of time. Dkt. 35. The Court noted that the Plaintiff's medical condition provided good cause to extend deadlines but denied the order because it would not extend the pretrial and dispositive motions deadlines without extending the trial date. Dkt. 36. The Court indicated it would "consider moving the parties' trial date to the end of its trial calendar and resetting all unexpired pretrial deadlines in accordance with the new trial date." *Id.* at 3. The parties now request that the trial date be reset to sometime in the summer of 2024, and the pretrial deadlines be reset as requested above. The parties do not have conflicts during the months of June, July, and August of 2024.

For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed dates and respectfully request that the Court grant their motion.

**SO STIPULATED.**

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1 DATED this 13th day of March, 2023.

2 NICHOLAS W. BROWN  
United States Attorney

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PLLC

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*Attorney for Plaintiff*

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13 I certify that this memorandum contains 319  
14 words, in compliance with the Local Civil  
15 Rules.  
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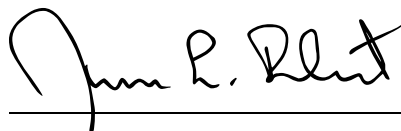
**ORDER**

It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial deadlines are as follows:

<b><u>Deadlines</u></b>	
Disclosure of expert testimony under FRCP 26(a)(2)	September 27, 2023
All motions related to discovery must be filed by ( <i>see</i> LCR 7(d))	October 26, 2023
Discovery completed by	November 24, 2023
All dispositive motions and motions challenging expert witness testimony must be filed by ( <i>see</i> LCR 7(d))	December 22, 2023
Bench Trial Date	<u>July 8, 2024</u>

The Clerk is DIRECTED to issue a new scheduling order consistent with the deadlines and trial date above.

DATED this 13th day of March, 2023.



JAMES L. ROBART  
United States District Judge